

Victorian Responsible Gambling Foundation submission to ASTRA Australia in relation to, *The review of provisions relating to the broadcast of gambling and betting commercials and the promotion of odds in live sport in the subscription television industry codes of practice*

Submitted 22 December 2017

Executive summary

The Foundation welcomes the opportunity to provide feedback on the proposed code revision by the Australian Subscription Television and Radio Association (ASTRA).

The Foundation notes the intention of the Commonwealth government's reform of advertising and the promotion of gambling during live sport. This being, to create a clear and practical safe zone where parents can be confident children can watch live sport without experiencing messages that normalise gambling as a part of sport.¹

The Foundation supports this reform as a step in reducing the normalising effects of advertising and promotion of sports gambling in all forms of media. The Foundation further notes the mounting body of evidence of gambling advertising's normalising effects on children. This includes giving them recognition of, and positive identification with, gambling brands. Also, providing them with an understanding of odds, of ways to bet, perceptions that gambling is relatively free of risk, and of formation of intentions to bet.

The Foundation notes the Victorian government's position on gambling advertising, which sees further restrictions as necessary. In particular, that any live sport that begins before the relevant 8.30pm restrictive zone should continue to be free from gambling advertising and promotions until 5 minutes after it finishes.² This would allow children to watch the match to its conclusion in the same safe zone they began watching in.

The Foundation is concerned that many of the provisions for the code proposed by ASTRA are not in accord with the government's intention nor the community sentiment or research evidence that informed it. In particular, exemptions being offered, on non EST time zones, in relation to forms of sport, the size of audience and in the promotion of fantasy sports.

Foundation recommendations

The Foundation does not accept the position put by ASTRA that the time zoned restrictions of 5am to 8.30pm should only apply to the Eastern seaboard, and only the Eastern seaboard excluding Queensland during summer. ASTRA cites the "national signal" of subscription TV as the reason it

¹ <https://www.communications.gov.au/what-we-do/television/broadcast-and-content-reform-package>

² The Hon Marlene Kairouz, Media Release, [Gambling Ad Ban Near Schools, Roads and Public Transport](#), 17 September 2017

cannot comply and claims it should not have to comply because of commercial disadvantage.

Yet the intent of the government is clear, to provide for *all* children a safe zone in which to watch live sport. ASTRA's proposed exemption to applying the time zone in numerous parts of Australia is based on claiming a right to protection of its commercial competition with broadcasters (who while competing for advertisers generally, will often not be competing for advertisers for the same events). It is asserting that, this right is more important than the government's intention of protecting children from exposure to gambling advertising during live sport.

By anchoring the restrictions to Australian Eastern Standard Time (AEST) or daylight saving time (AEDST), ASTRA's proposed provision is undermining the purpose of the restrictions and denying their importance. In effect, ASTRA is saying that only *some* Australian children should be protected by the 5am to 8.30pm restriction.

The purpose of the government policy cannot be but to treat all children as equally valuable and to provide for all of them the safe zone it has determined upon.

1. The Foundation recommends that if subscription television cannot deliver this broadcast policy equitably to all Australians at the appointed times, *in the time zone they are watching in*, then the restrictions be widened to be adequate to it doing so, and thus protecting all children. Thus the restriction should be from 5am AEST (or AEDST) to 8.30pm Western Australian Standard Time (WAST).

The Foundation also does not accept the reasoning in ASTRA's paper that suggests that long forms of sport are different and should not be treated as 'siren to siren' sports are.

The intentions of the Commonwealth government are clear and the rules of the code should be too. That is, when live sport is being shown, parents will be able to be confident that children will not be exposed to gambling advertising and promotions.

Thus a day broadcasting test cricket or the Australian open, or the Olympics, is a live sport event until there is a substantial break that has programming unrelated to the live sport. This is a common sense view that constitutes a reasonable expectation of what government policy will provide. It does not mean, as the paper asserts, that 90 seconds counts as break in the broadcast of the live sport.³

Rather than a definition of long form sports being a reason to exempt such broadcasts from aspects of the restrictions, the Foundation would say these sports are actually are experienced by viewers as longer and comprehensive forms of a live sport broadcast. Crosses from one part of the competition to another, different Olympic events or matches in the tennis, are all part of the same live sport broadcast experience.

2. At all times, the live sport broadcast of *all sport in any form* should abide by the restrictions relating to no advertising before, after or during the broadcast, between 5am and 8.30pm. This will be a clear and practical measure supporting the provision of a safe zone for children to watch sport without it being linked to gambling. By making the restrictions universal it will

³ ASTRA invitation for comment paper p.9

be clear to parents that, provided their children are watching live sport at these times, they will not be exposed to gambling advertising or promotions

3. The Foundation therefore also recommends, that the code be comprehensive in its definitions, covering off all forms of gambling promotions and advertising, including sponsorships, brand promotions and merchandising.
4. The Foundation therefore also recommends, that the exemption proposed for low audience share channels, (clause 11 in the paper), not be accepted. As with argument regarding time zones, ASTRA seems to misunderstand the government's intention to protect all children in a clear and practical way. The reasoning for the exemption, that the number of children watching may be small, requires accepting the premise that, because they are few in number, they are not important enough to protect. The intention is to protect all children watching live sport equally, not to protect only them only when there are large numbers of them.
5. With regard to sports tipping and fantasy competitions, the Foundation recommends distinguishing between those promoted by bookmakers (acting as a form of marketing but also requiring spending and often with large cash prizes) and more innocuous games presented purely for entertainment value and in no way associated with gambling or the gambling industry. Tipping competitions that promote gambling company brands and fantasy sports competitions that are in fact wagering products should not be exempted from the restrictions. Daily Fantasy sports, such as Draft Stars for example, do not differ from general sports betting in terms of potential expenditures and timelines.
6. With regard to the start and finishing time restrictions of 5 minutes before and after an event, the Foundation recommends it should be the five minutes before the cross to the ground or event venue and for five minutes after all the players have left the ground, playing area. This accords realistically with when the attention of the audience, particularly children, is likely to be engaged with the event as a live event.
7. With regard to delayed transmission of events, it is recommended that for any transmission of a full or a substantial part of sporting event, within the 24 hours after it has occurred, the restrictions apply. For example, a delayed re-broadcast of an Olympic event that occurred overnight, replayed at 8.00am, would be captured by the restrictions.

Overall, the government's intention could not be more clear, no gambling advertising during live sport between 5am and 8.30pm. This should be applied in a blanket manner, in order to provide a safe zone where all Australian children can watch live sport without advertising and promotions intruding. The intention is to make this a safe zone where parents can be confident children will not be exposed to messages that give them the impression that gambling is a part of participation in watching or following sport.

Under the numerous exemptions proposed by ASTRA, parents would have to be across what sports and what channels were covered and in what time zones the restrictions applied. This is not providing parents with either clear advice or practical, easy to understand and use options. In

addition not all children would be protected equally, where they lived and what they watched would change the level of protection they are given.

The revised code should clearly state and make good the intention to provide blanket restrictions in its rules. The proposed version, with its exceptions, does not meet the intent of the government or the expectation of the community in terms of protecting children.

About the Foundation

The [Victorian Responsible Gambling Foundation](#) is a statutory authority established in 2012 with the bipartisan support of the Victorian Parliament.

Taking a public health approach, the Foundation strives to meet its mandate by acting across four key areas:

- 1) increasing community awareness about the risks of gambling and the help available, through public campaigns and community education
- 2) providing information and advice to the community on the Victorian gambling environment to promote discussion and participation in decisions about gambling
- 3) conducting research to better understand the impact and address the negative consequences of gambling in our communities.
- 4) providing effective and accessible Gambler's Help counselling services

The foundation is firmly focused on identifying, understanding and ameliorating the impact of gambling harm.

Introduction

The Foundation welcomes the opportunity to provide feedback on the proposed code revision for subscription TV, intended to accommodate the Commonwealth government's policy of banning gambling advertising and promotions between 5am and 8.30pm for five minutes before or after live sport.

The government's policy is based on evidence and the widespread community concern that constant gambling advertising is forming views among children that gambling is a normal part of participating in watching sport.⁴ The government has stated that the policy is being made to provide children with a 'clear and practical safe zone' where they can watch sport without this happening.⁵

⁴ See for example, Thomas SL, Randle M, Bestman A, Pitt H, Bowe SJ, Cowlshaw S. 2017, 'Public attitudes towards gambling product harm and harm reduction strategies: An online study of 16-88 year olds in Victoria, Australia'. *Harm Reduction Journal*. (49):1-11; Sproston, K. Hanley, C. Brook, K. Hing, N. and Gainsbury, S. 2015, [Marketing of sports betting and racing](#). Gambling Research Australia. p145ff. See also, [Communications Legislation Amendment \(Online content and Services and other Measures\) Bill](#), Regulatory Impact Statement pp.5-9

⁵ Department of Communications and the Arts, [Fact Sheet: Broadcasting – moving to more efficient broadcasting fees \(PDF, 422KB\)](#) October 2017; Dept of Communications and the Arts Broadcast and Content Victorian Responsible Gambling Foundation 22/12/17

The Foundation shares the government's concerns regarding the normalisation of gambling in relation to sport, particularly in relation to the way children are being encouraged by gambling advertising and promotions to view sport. This normalisation is occurring at a time where children, especially of primary school age, have limited comprehension and reference points.⁶ Further, in the case of all sports except horse and dog racing, the advertising messages run counter to traditional Australian engagement with sports.

Traditionally, Australian's have engaged as fans of sport, supporting teams or players and appreciating the skills and efforts of those playing. In relation to children, Australia has a strong culture of using sport to model behaviours and teach lessons about effort, co-operation, and fair play. In contrast, gambling on sport prioritises seeing it as a series of opportunities to make bets that will have outcomes of win or loss for the individual making the bets. This is a very different framing of the values and perceptions of what it means to watch sport.

The Foundation in its own prevention program, '[love the game](#)', emphasises the former values and works with sporting organisations to continue those values and shield children from exposure to promotions of a culture of gambling on sport.

The Foundation views the introduction of a ban on advertising and promotions during live sport as an important step in protecting children from the socialisation effects of the widespread promotions and advertising of gambling that saturate the media environment. A socialisation that changes the meaning of sport and encourages false ideas about both the normality of gambling and the risks associated with gambling.

The Foundation notes the policy position held by the Victorian state government, that the restrictions would work better and provide more safety, if any match that began before 8.30pm was required to be free from gambling advertising and promotions until its conclusion.⁷ This would allow children to watch games to their conclusion. It is a practical reality that many children, particularly adolescents, will stay up to watch the end of a game. It is logical that, if the purpose of the policy is to provide parents with the assurance their children can watch live sports free from exposure to gambling, applying the restrictions to the entirety of matches that begin before 8.30pm will provide a better outcome.

Evidence supporting reform

The Foundation notes that there is strong evidence that children as young as eight are absorbing in a positive manner messages from gambling advertising, including recognition of brands and perceptions that gambling can be risk free because you will be offered your money back. Older

Reform package at <https://www.communications.gov.au/what-we-do/television/broadcast-and-content-reform-package>; Media release, Senator the Hon Mitch Fifield, [Major Reforms to Support Australian Broadcasters](#) 6 May 2017

⁶ For discussion see, Jeffrey E. Brand, *Television Advertising to Children: A review of contemporary research on the influence of television advertising directed to children*, ACMA, May 2007

⁷ The Hon Marlene Kairouz, Media Release, [Gambling Ad Ban Near Schools, Roads and Public Transport](#), 17 September 2017

children, in late primary school and early high school, are also absorbing notions of how to bet and what to bet on. The applicability and importance of odds is also becoming part of children's views of how one should see sport.⁸

Standard Media Index reports that, Australia wide the gambling industry spent \$234 million on all advertising in 2016. This expenditure has been steadily increasing throughout the decade, it is up from around \$90 million in 2011.⁹ Gambling advertising is highly prevalent in broadcast media and currently occurs even in children's television viewing times if news or sport is being broadcast. Further, it is not surprising that the effects of advertising are strong on those children who like to watch sport, since live sport and programs about sport are where the advertising is concentrated.¹⁰ Moreover, adolescents may have higher exposure to gambling advertising than adults.¹¹

This mass advertising of sport is a relatively new phenomenon, so definitive evidence of the impact this advertising will have on children's gambling as adults is not yet available. However, there is evidence that advertising is creating intentions to bet among some adolescents.¹² Moreover, research has found that many young adult gamblers do now regard gambling as major part of how they are watching and engaging with sport.¹³

Betting on sports is the form of gambling that is growing fast in Victoria and elsewhere.¹⁴ In terms of experience of harm from gambling on sports, Foundation analysis of Victorian research findings indicates that, around 37 per cent of those gambling on sport experience some form of harm.

⁸ Hannah Pitt, Samantha L. Thomas, Amy Bestman, Mike Daube, Jeffrey Derevensky, 2017 What do children observe and learn from televised sports betting advertisements? A qualitative study among Australian children, *Australian and New Zealand Journal of Public Health* [online](#); Pitt H, Thomas SL, Bestman A, Stoneham M, Daube, M. 2016, "It's just everywhere!" Children and parents discuss the marketing of sports wagering in Australia. *Australia and NZ Journal of Public Health* 40(5):480-6; Thomas S, Pitt H, Bestman A, Randle M, Stoneham, M, Daube M. 2016, *Child and Parent Recall of Gambling Sponsorship In Australia*. Melbourne: Victorian Responsible Gambling Foundation; Hing N, Vitartas P, Lamont M, Fink E. 2014, 'Adolescent exposure to gambling promotions during televised sport: An exploratory study of links with gambling intentions'. *International Gambling Studies*. 14(3):374-93; Derevensky J, Sklar A, Gupta R, Messerlian C. 2010, 'An empirical study examining the impact of gambling advertisements on adolescent gambling attitudes and behaviors'. *International Journal of Mental Health and Addiction*. 8(1):21-34.

⁹ Figures from Standard Media Index. Note, they do not include sporting sponsorships or program branded content

¹⁰ Pitt 2017

¹¹ Sproston 2015 pp143-7;

¹² Sproston 2015 p.176

¹³ Deans EG, Thomas SL, Daube M, Derevensky J. 2017, 'The influence of marketing on the sports betting attitudes and consumption behaviours of young men: implications for harm reduction and prevention strategies' *Harm Reduction Journal* 14:5; Deans EG, Thomas SL, Daube M, Derevensky J. 2016, 'The role of peer influences on the normalisation of sports wagering: A qualitative study of Australian men'. *Addiction Research and Theory*. 2016;25(2):103-13

¹⁴ [Australian Gambling Statistics](#) 33rd edition, Hare S. 2015, [Study of Gambling and Health in Victoria](#), Victorian Responsible Gambling Foundation

On the proposed code changes by ASTRA – exemptions rejected

The Foundation is dismayed to see the proposed code changes are not in accord with the stated intention of the government in banning advertising and promotions of gambling within five minutes of sport starting and ending, between the hours of 5am and 8.30pm.

Instead, the proposed code contains exemptions to this clearly stated intention.

In particular, we note the proposed code wants to make the following exceptions to the restrictions:

- a) Applying them differently for different time zones, effectively wanting the ban to only apply in full to those states in AEST or AEDST¹⁵
- b) Relaxing them during so-called long form games of sport, where a limited number of gambling ads would be allowed.¹⁶

In both cases the effect is to undermine or negate the intent and spirit of the government's policy and to disregard community sentiment. Instead, under the code changes proposed by ASTRA, the 'safe zone' for children shall only exist for some children during some types of sport.

In relation to (a) ASTRA states that, because subscription TV sends a single national signal, it is not possible to discriminate by time zone. Little information is offered apart from this statement, so it is not clear if this is for reason of cost or is a technical limitation.

Regardless of which is the case, the exemption amounts to ASTRA claiming the right to discriminate against Australian children not living in Eastern seaboard states (and also those in Queensland during the summer.)

The government, acting on evidence and in accord with community demands, has declared a ban during these time periods as policy for the public good of children. It has not said for "some children". The effect of the proposed exemption is to say that the 8.30pm cut-off is effectively flexible. It does not matter if some children are being exposed to gambling advertising from 8pm (SA), 7.30pm (Qld in summer) or as early as 5.30pm (WA in summer).

The Foundation would note that the 8.30pm cut off is very conservative. Many children will still be watching sport past this time, especially on weekends. The Foundation would have preferred that if advertising were to take place, the starting time would be 9.00pm. This is when there would be a much higher likelihood that parents were watching with children and were in a position to provide critical commentary to accompany the promotions or mute them out in some way.¹⁷

The Victorian government's position is that the restrictions do not go far enough. The Minister has expressed the recommendation that once a live sporting event has begun, within the times of 5am to

¹⁵ See ASTRA consultation paper Appendix A, clause 5

¹⁶ See ASTRA consultation paper Appendix A, clause 3

¹⁷ Victorian Responsible Gambling Foundation, 2015, [Submission to the Review of the Impact of Illegal Offshore Wagering](#) pp.8-9

8.30pm, it should remain free from gambling promotions until it concludes.¹⁸

For the ASTRA to move the time back to as early as 5.30pm in WA, on the basis of commercial interest, is not acceptable. If the subscription TV services technically lack the ability to properly provide for matters related to their licence, in accord with the needs of particular parts of Australia they are licenced serve, they should adjust the restriction period so that all children benefit from the government policy.

The Foundation therefore recommends that, if only a national signal is possible, the ban needs to apply from 5am EST or EDST to 8.30pm WAST.

In relation to (b) we find the clauses around 'long form sports' unclear in wording and reasoning. What they appear to imply is, that because long form sports exist, ie are not siren to siren sports, than they will have exemptions for the promotion of gambling inside the times of 5am to 8.30pm. The statement is, that by their nature prohibition during long sports is "not appropriate". However, no explanation is given of why, in relation to the intention to protect children's experience of watching sport, this is not appropriate.

Regardless, and in accord with the government's expressed policy wish of a creating a safe and practical zone where families can watch live sport, the nature of the sport should offer no exemption to the general ban. Clear and practical policy for Australian parents and their children means that parents can be confident that, at any time between 5am and 8.30pm when their children are watching live sport, they can be assured their children will not subjected to promotions and messages about gambling.

The notion that, because long form sports might have different break formats or be continuous over time is a red herring. In fact, the long form of a sport effectively takes the entire broadcast into the live event territory. For example a day of tennis or test cricket is a continuous live experience for those watching.

The proposed provisions refer to stoppages and also distinct breaks of at least 90 seconds as being periods that can be exempt from restrictions on advertising. Children in fact are more likely to continue watching during stoppages and breaks of many minutes, not seeing a break as a break, while adults will leave the room.¹⁹

The Foundation therefore recommends that the code should remove these exemptions and commit to delivering the government's intended clear and practical safe zone. That is, it will be clear that there will be no gambling advertising or promotions of gambling during periods where live sport is being broadcast. In the case of long form, this includes the duration of the day or night's play (inside the restriction to 8.30pm).

Being practical, a day of test cricket, or the Australian Open day session, is all live play from the point of view of children and parents. The suggestion that a 90 seconds break in programming between

¹⁸ The Hon Marlene Kairouz, Media Release, [Gambling Ad Ban Near Schools, Roads and Public Transport](#), 17 September 2017

¹⁹ See for example, Sproston 2015 p.47

events or contests is a meaningful reason for exempting the service from the restrictions makes no sense. A long break of 30 minutes or more before the night session begins, where for example a program unrelated to the sport, eg. the news, is on, would count as a real break where the restriction need not apply. For viewers, simply switching programming during the Olympics from track to diving events, or between matches in the tennis, does not constitute a break in the watching the sporting event.

Moreover, it would run counter to the policy's broader intentions if a lunch break in the cricket, featuring highlights from the match and commentary about the match, co-joined with a cricket show precisely likely to engage younger viewers, was regarded as exempt from the restrictions and eligible to have gambling advertising placed during it.

Niche channels

ASTRA's proposed provisions also include exemptions for what it calls niche channels. This is because they have small audiences. It suggests that this is not where community concern is focussed.

The Foundation disagrees. The concern is with children being exposed to gambling advertising and promotions while watching sport. The sport they are watching or how many are watching, as was stated earlier, is not the point. In fact, on the figures given in the ASTRA papers, the percentage of under 18s watching these niche channels is about the same as those watching live sports generally on all subscription services. The figures are between 5 and 12 per cent.²⁰

The intention is to provide a clear and practical policy that assures Australian parents and other caregivers with assurance that if their children are watching live sport between the hours of 5am and 8.30pm they will not be exposed to gambling advertising. This proposed exemption, along with the others around time, type of sport, type of gambling product, all run counter to this intention.

Fantasy sports and sports tipping competitions should not be conduits to gambling, gambling companies or culture

ASTRA proposes that fantasy sports and tipping competitions not be included in the restrictions. It argues that, because they are unlikely to trigger short term wagering during sporting events and because they are niche products with relatively low participation, they are low risk and should be exempt.

ASTRA also suggest there is meaningful distinction between fantasy sports and other forms of sports betting because the advertising in fantasy sports often features the notion of "betting against your mates" and this is not "anti-social". In fact, the actual product is expenditure with a bookmaker. That the advertising may actually mislead viewers about this, perhaps especially children, even suggesting to them that what is being offered is not a form of commercial gambling, is actually a further argument for why children need to be protected from such advertising.

Overall, ASTRA's reasoning misunderstands the principle intention of the policy. That is, to protect children from being exposed, while watching sport, with messages that part of watching sport is

²⁰ ASTRA paper, table 1 and clause 11

gambling on it. This is the risk the policy intends to reduce.

The Foundation also notes that tipping competitions that are run by licensed bookmakers, propagate their brand and are clearly part of strategy to grow their market share. In addition, they further encourage the belief that skill and knowledge can create large winnings. In this sense, they are no more suitable for children than more overt advertising for gambling.

Likewise, fantasy sports competitions conducted by bookmakers, especially as daily fantasy sports, are gambling products. They are a form of sports betting. They thus should not be promoted during the restricted times.

The Foundation recommends that any fantasy sports or tipping competitions run by gambling companies that offer large prizes, opportunities to wager, or promote gambling brands or links to gambling brands and sites, should be included in the restrictions on gambling advertising.

Other matters

Restrictions on gambling advertising should be comprehensive

The Foundation notes that the Commonwealth government has set out its intent to curtail gambling advertising and promotions via a restriction on them before, after and during live sport between 5am and 8.30pm.

The Foundation recommends that the provisions explicitly cover all forms of gambling advertising and promotions. This means they would include:

- 1) Commercials
- 2) Sponsorships and any form of brand representations and references
- 3) Any signage or pull outs that are put in place on the screen by the licensee that refer to gambling campaigns or brands or storylines
- 4) Any advertisements that are linked to, or reference, brands or brand storylines
- 5) References to odds or companies in the commentary
- 6) Appearances by figures identified as celebrities linked to brands or wearing brand sponsored clothing while uniquely appearing as guests on the licensee's broadcast. An exception could be made for crosses to live to ground interviews where the team uniform may contain branding.
- 7) Other products or promotions, such as fantasy competitions, that are sponsored by or include gambling company brands and logos

When the five minutes starts?

The proposed code suggests the five minute restriction should begin from the first action of the game, eg. the blowing of the umpires whistle in Australian rules. The Foundation recommends as

more practical, realistic and protective, that the restriction should be five minutes before the cross to the ground or event venue, that is, to the live commentary team. The timing of the five minutes after should begin when players have left the playing area. All this accords realistically with when the attention of the audience, particularly children, is likely to be engaged with the event as a live event.

Delayed broadcasts

The proposed code states that first run transmission of delayed programming will not be covered by the restrictions. The Foundation recommends that any transmission of a whole or substantial part of a broadcast, (a quarter of football, a replay of the half or all of the Superbowl) should have the restrictions applied to it for 24 hours after the event.

This is because many people, including children, will watch as “live” events that were on late or in the early hours of the morning.

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